

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 05-CR-10164-GAO

GUILLERMO FREDERICO VASCO

JOINT MOTION FOR CONTINUANCE OF
STATUS CONFERENCE

The parties respectfully request the Court to continue the status conference presently scheduled for Friday, January 20, 2006, for 30 days, and to exclude the period until the next status conference under the Speedy Trial Act. The parties state the following in support of this request:

1. Defense counsel requires additional time to review the materials taken from the defendant's jail cell when he was housed in Middleton, Massachusetts, and to have certain of the materials translated from Spanish to English. Defense counsel advises that his client has identified some documents to be translated but counsel needs to further meet with and discuss these materials with his client. The government does not object to the continuance.

2. The parties agree that the period between January 20, 2006, and the date of the next status conference should be excluded under 18 U.S.C. §3161(1)(8)(A).

WHEREFORE, the parties request that the status conference be continued for 30 days

and that the period between January 20, 2006, and the date of the next conference, when scheduled, be excluded in that the ends of justice served by doing so outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

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Dated: 1/19/06

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 19, 2006.

/s/ Sandra S. Bower
Assistant U.S. Attorney